

**Federal Deposit Insurance Corporation
Disability Employment Program
Strategic Plan**

2017

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Disability Employment Program Strategic Plan**

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Vision

The Federal Deposit Insurance Corporation (FDIC) will be a model employer of individuals with disabilities, individuals with targeted disabilities, and disabled veterans, and ensure those individuals are included in all areas of the FDIC workforce.

Introduction

The FDIC is committed to ensuring equal opportunity in the employment of all persons, including individuals with disabilities, individuals with targeted disabilities, and disabled veterans. This Disability Employment Program Strategic Plan (Plan) details specific strategies to address the recruitment, employment, development, advancement, and inclusion of individuals with disabilities. Additionally, the Plan addresses the goals of Executive Order (EO) 13548, *Increasing Federal Employment of Individuals with Disabilities*, dated July 26, 2010, which seeks to increase federal employment of people with disabilities through compliance with EO 13163, dated July 26, 2000, entitled *Increasing the Opportunity for Individuals with Disabilities to be Employed in the Federal Government*. EO 13163 was issued to promote the hiring of individuals with disabilities and support the goals articulated in Section 501 of the Rehabilitation Act of 1973, as amended (federal hiring of individuals with disabilities).

The goals, strategies, and action items presented in this Plan align with the FDIC's Diversity and Inclusion (D&I) Strategic Plan, the FDIC's annual *Federal Agency Annual Equal Employment Opportunity Program Status Report* to the U.S. Equal Employment Opportunity Commission (EEOC) pursuant to Management Directive 715 (MD-715), and the FDIC's annual *Disabled Veterans Affirmative Action Program (DVAAP)* report/plan to the U.S. Office of Personnel Management (OPM).

The FDIC considers this Plan to be an important step in continuous efforts to include individuals with disabilities, individuals with targeted disabilities, and disabled veterans in its workforce. The Plan also provides for critical support to divisions and offices, fosters collaboration and coordination of acceptance, accommodation and accessibility, and encourages relationships with organizations that support the employment of individuals with disabilities.

The FDIC's D&I Executive Advisory Council (D&I EAC) will oversee and monitor the implementation of this Plan and will draw upon the in-house expertise of the Office of Minority and Women Inclusion (OMWI) and Division of Administration (DOA) to promote leadership engagement in the Plan. As advisor to FDIC leadership on issues related to diversity and inclusion, OMWI will provide analytics and reports on disability employment progress and increase organizational awareness and engagement about disability employment and inclusion throughout the agency on an ongoing basis. As advisor to FDIC leadership on issues related to human resources, DOA will provide guidance on disability recruitment and the use of special appointing authorities to employ individuals with disabilities. DOA will also make recommendations regarding FDIC policies and procedures that may assist in increasing the employment of individuals with disabilities.

In support of this Plan, the FDIC has established a 2017 Performance Goal to review the new EEOC regulations on "Affirmative Action for People with Disabilities in Federal Employment" to identify necessary modifications to the Plan to bring it into compliance with those regulations. The revised plan will be presented to the D&I EAC for approval by December 31, 2017.

Definitions

Disabled Veteran – An individual who has served on active duty in the armed forces, has been separated therefrom under honorable conditions, and has established the present existence of a service-connected disability or is receiving compensation, disability retirement benefits, or pension because of a public statute administered by the Department of Veterans Affairs or a military department.

Individual with a Disability – A person with a physical or mental impairment that substantially limits one or more major life activities (such as walking, talking, seeing, hearing, or learning), has a record of such impairment, or is regarded as having an impairment unless the impairment is both transitory and minor.

Reasonable Accommodation – Any change in the work environment (or in the way things are usually done) to help a person with a disability apply for a job, perform the duties of a job, or enjoy the benefits and privileges of employment.

Self-Identification of Disability – The voluntary completion of OPM's Standard Form 256 (SF 256), identifying that an individual has a disability.

Targeted Disability – Specific disabilities targeted for emphasis in affirmative action planning, and include: developmental disability; traumatic brain injury; deafness; blindness; missing extremities; partial paralysis; complete paralysis; epilepsy; intellectual disabilities; psychiatric disabilities; dwarfism; and significant disfigurement.

Employees with Disabilities in the Workforce

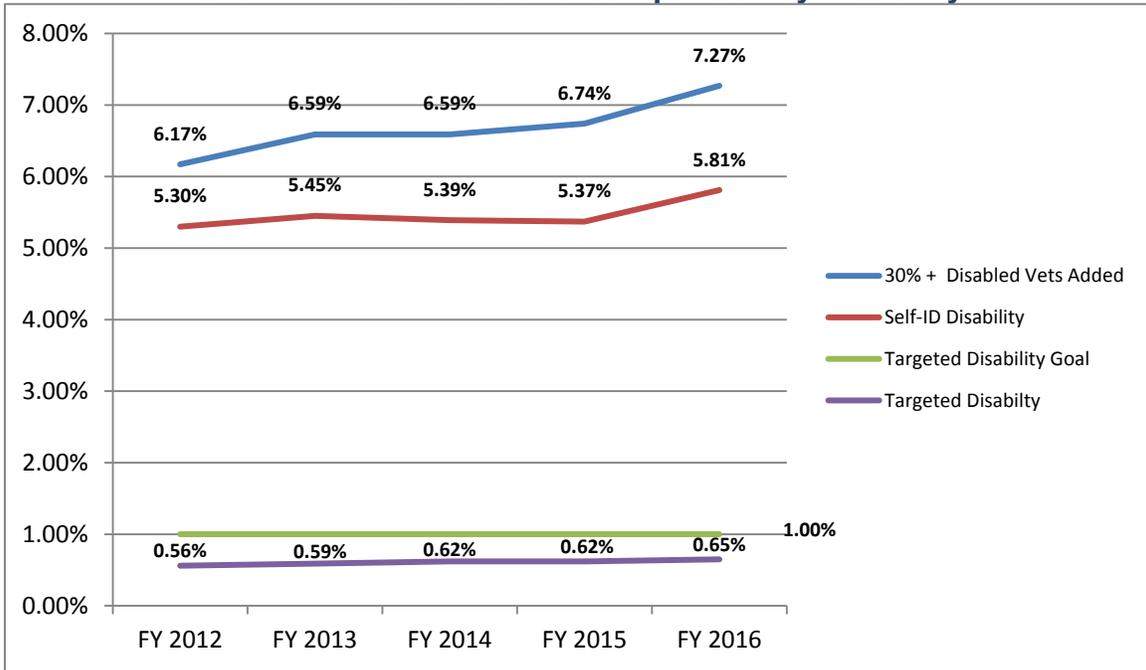
The FDIC has a longstanding commitment to the employment of individuals with disabilities, individuals with targeted disabilities, and disabled veterans. Each year, the FDIC conducts a workforce analysis to assess the participation and inclusion of those individuals via its MD-715 report, DVAAP report/plan, and other assessments of the FDIC workforce. The workforce analysis informs FDIC leadership on progress and permits the development and implementation of additional strategies to eliminate barriers and increase employment opportunities.

When evaluating data produced from FDIC reporting systems, the FY 2016 workforce representation of FDIC employees who self-identify as having disabilities is 5.81%, an increase from 5.37% in FY 2015. The representation of employees with targeted disabilities increased from 0.62% in FY 2015 to 0.65% in FY 2016.

When veterans with compensable service-connected disability ratings of 30% or more, who did not otherwise self-identify a specific disability, are included as individuals with disabilities, the FDIC's total percentage of individuals with disabilities increased from 6.74% in FY 2015 to 7.27% in FY 2016.

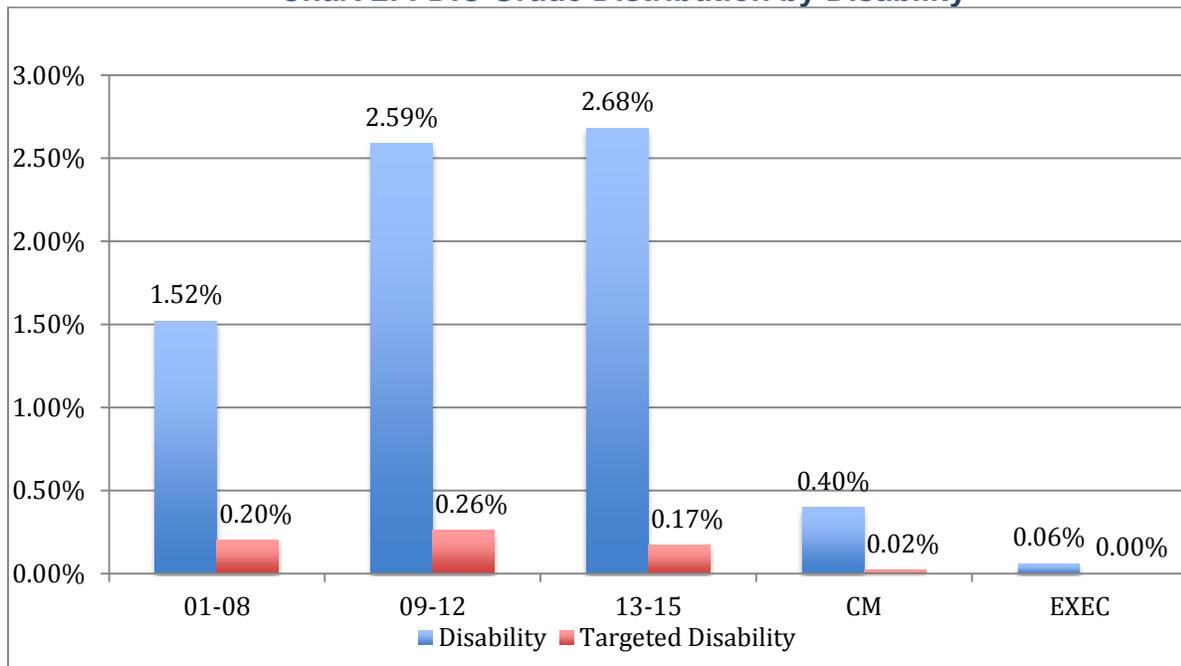
Chart 1 below on *FDIC Trend and Comparison by Disability* provides a five-year look at the FDIC's workforce representation of individuals who self-identify disabilities, individuals with targeted disabilities, and all employees with disabilities (including veterans with compensable service-connected disability ratings of 30% or more). There has been an upward trend in the representation of individuals with disabilities over time, and a positive change for individuals with targeted disabilities. In FY 2014, the FDIC established a goal to increase the workforce representation of employees with targeted disabilities to 1 percent of its total workforce by October 2019. This goal is a major driver of this Plan.

Chart 1¹: FDIC Trend and Comparison by Disability



As of the end of FY 2016, the *FDIC Grade Distribution by Disability* (Chart 2) shows that the largest percentage of individuals with disabilities is in the CG-13 to CG-15 grade levels. The largest percentage of individuals with targeted disabilities is at the CG-9 to CG-12 grade levels. The FDIC workforce includes employees with disabilities at the Corporate Manager and executive levels, but there is only one employee with a targeted disability at those levels.

Chart 2: FDIC Grade Distribution by Disability²



¹ FDIC personnel action data from the Corporate Human Resources Information System (CHRIS)

² FDIC personnel action data from CHRIS

Objectives, Strategies and Action Items

Goal: 1. Build a diverse, high-performing workforce that reflects all segments of society, including individuals with disabilities.

Strategy: 1.1. Demonstrate leadership commitment to the recruitment, employment, and advancement of individuals with disabilities.

Action Items:

- a. Communicate to all managers, supervisors, and Human Resources staff regarding the FDIC's hiring goals and commitment to the employment of individuals with disabilities.
- b. Integrate disability employment initiatives with the FDIC's Diversity and Inclusion Strategic Plan.
- c. Host a roundtable discussion with other financial regulatory agencies to consider best practices in government for recruiting, hiring, advancement, retention, and inclusion of individuals with disabilities.
- d. The FDIC Disability Program Manager will continue to participate in federal-wide best practices working groups focused on disability employment and inclusion.

Strategy: 1.2. Increase the applicant pool of qualified individuals with disabilities.

Action Items:

- a. Continue using the Workforce Recruitment Program (WRP) for hiring college students and recent graduates for internships and permanent employment.
- b. Establish a procedure to use the OPM Shared List of People with Disabilities.
- c. Enhance recruitment activities to develop closer relationships with colleges and universities with a high enrollment of students with disabilities.
- d. Coordinate with State Vocational Rehabilitation Agencies (SVRAs) and build relationships with local and national organizations facilitating employment of individuals with disabilities.
- e. Continue using special appointing authorities that consider individuals with disabilities (Schedule A, Disabled Veterans, Pathways).
- f. Create procedures for accepting and referring unsolicited resumes for current and future vacancies from candidates eligible under Schedule A, 5 CFR 213.3102(u).
- g. Explore options for obtaining applications outside of the usual competitive hiring processes from candidates eligible for hiring under Schedule A, 5 CFR 213.3102(u), to invite the candidates to scheduled Corporate Employee Program (CEP) hiring events.
- h. Encourage employees with disabilities to participate in outreach and recruitment activities, particularly alumni of schools with a high enrollment of individuals with disabilities.
- i. Evaluate the effectiveness of the reasonable accommodation program in the recruitment and hiring processes.

Strategy: 1.3. Enhance the Corporate Recruitment Program by improving and/or expanding existing communication and marketing efforts to ensure that individuals with disabilities receive real-time information about FDIC hiring events, job vacancies, webinars, and other employment-related communications and information.

Action Items:

- a. Make information about disability resources available externally at fdic.gov and internally at FDICnet, to include employment opportunities, reasonable accommodation procedures, and the hiring process for applicants with disabilities.
- b. Create information materials on the FDIC Disability Employment Program, including information about special appointing authorities, to disseminate to potential applicants and post externally at fdic.gov.

Strategy: 1.4. Provide reasonable accommodations to qualified employees and applicants with disabilities, as required by applicable laws and regulations.

Action Items:

- a. Provide training opportunities for managers and supervisors on reasonable accommodation process.
- b. Provide training opportunities and/or information for employees or applicants on how to request a reasonable accommodation.
- c. Provide effective reasonable accommodations to qualified individuals with disabilities, in accordance with applicable laws and regulations.
- d. Update the Reasonable Accommodation Request Information System (RARIS) to allow for employees and managers to submit electronic reasonable accommodation requests and to improve reasonable accommodation data.
- e. Encourage employees requesting reasonable accommodations to complete OPM Standard Form SF 256 by making it available when employees submit requests for accommodation.

Strategy: 1.5. Identify and eliminate barriers to the employment and advancement of qualified individuals with disabilities at all levels and in all occupations.

Action Items:

- a. Annually solicit voluntary self-identification of disability data to allow employees to update their status.
- b. Conduct an annual trend analysis and barrier analysis specific to the employment and advancement of individuals with disabilities.
- c. Develop and provide guidance to managers and recruiters on trends in the recruiting, hiring, advancement, retention of individuals with disabilities, and progress in implementing the FDIC and Division and Office diversity strategies targeted at individuals with disabilities.

Goal: 2. Cultivate a work environment that is inclusive of individuals with disabilities.

Strategy: 2.1. Leverage the talents of the FDIC workforce and empower diverse perspectives throughout the organization through career/leadership development.

Action Items:

- a. Encourage employees with disabilities to participate in available formal mentoring, career development, leadership, and management development programs and track representations.
- b. Ensure all announcements to employees about career development programs include instructions for requesting reasonable accommodations.
- c. Increase utilization of “Lunch and Learn” sessions and guest speakers to increase awareness and competency with respect to working with individuals with disabilities.
- d. Encourage the formation of a Disability Employee Resource Group.

Goal: 3. Facilitate stakeholder relations through effective leadership and accountability.**Strategy: 3.1. Strengthen relations with stakeholders, to include disability affinity groups, professional organizations, and educational Institutions serving individuals with disabilities.****Action Items:**

- a. Continue partnerships with Computer/Electronic Accommodations Program (CAP) and Job Accommodation Network (JAN) to support accommodating employees with disabilities.
- b. Establish partnerships and affiliations with Disability Serving Institutions, professional organizations, stakeholders with disabilities, and other disability affinity groups to promote career opportunities and internships with the FDIC, as well as market the FDIC as an employer of choice to the Disability community.
- c. Reach out to Disability affinity groups and professional organizations through participation at national training conferences and university/college career fairs aimed at providing FDIC career and employment information to the Disability community.

Strategy: 3.2. Enhance FDIC leaders’ knowledge and skills to effectively lead a diverse workforce that includes individuals with disabilities.**Action Items:**

- a. Use OPM-developed, computer-based training to increase the FDIC training portfolio for Diversity and Inclusion topics regarding special appointing authorities for veterans and people with disabilities and inclusion of these individuals in the workforce.
- b. Add a segment on disability awareness and competency in leadership training to managers and supervisors.
- c. Provide senior leaders (D&I EAC, WE Steering Committee, etc.) an analysis of the satisfaction of employees with disabilities with the work environment based on the annual Federal Employee Viewpoint Survey (FEVS) results.
- d. Develop and provide managers and supervisors with a disability “toolkit” of available resources, guidance, and other useful information.

Monitoring and Evaluating

In FY 2014, the FDIC added disability data to its existing D&I Analytics Dashboard, giving the agency access to relevant workforce data on a quarterly basis. The dashboard provides current workforce data, as well as four-year historical trend data. OMWI will create a matrix for tracking the implementation of the plan's action items, and will continue to monitor and evaluate hires, promotions, and separations of individuals with disabilities. At least annually, OMWI will report to the D&I EAC regarding the plan's implementation and the results of agency efforts to increase the representation of individuals with disabilities.

Effective Date: This Plan becomes effective upon signature of the FDIC Chairman and will be revised annually.